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*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST  
WARRANT**

I, Tanner Collins, being duly sworn, hereby depose and say:

1. I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On January 29, 2020, in Omaha, Nebraska, TINA HARDIN threatened to shoot up the VA and shoot VA dispatchers: R.M., J.S., and J.B., on account of their official duties at the VA, in violation of Title 18 U.S.C. 115(a)(1)(B). This affidavit is in support of a criminal complaint and arrest warrant TINA HARDIN, a black female, DOB xx/xx/1968. I further state that I am a Special Agent, with the Veteran Affairs Office of Inspector General and that this complaint is based on the following facts:

2. Your affiant, Tanner Collins, is employed as a Special Agent (SA) with the United States Veterans Affairs Office of Inspector General (VAOIG) assigned to the Kansas City, Missouri office. I have been a Special Agent since March 2011. As such, your affiant is empowered to conduct investigations and make arrests for offenses against the laws of the United States of America. During this time, your affiant has conducted and/or participated in investigations related to criminal activities. SA Collins has successfully completed the Federal Law Enforcement Training Center Criminal Investigator Training Program and the Air Force Office of Special Investigations Basic Agent's course. SA Collins is a graduate of the Community College of the Air Force with a A.A. in Criminal Justice and a graduate of DeVry University with a B.S. in Computer Information Systems.

3. The following information is known to me personally or was reported to me by other Law Enforcement Officers, and reliable cooperating individuals.

4. On January 30, 2020, I was contacted by the Veteran Affairs (VA) police regarding an employee of the VA, TINA HARDIN ("HARDIN"), who on January 29, 2020, was brought into the Omaha VA Medical Center (VAMC), Omaha, NE, by her ex-husband V.J., to seek help from a doctor. While being admitted, HARDIN made homicidal and suicidal statements to VA medical staff. Specifically, HARDIN stated she wanted to "shoot up the VA."

5. HARDIN voluntarily admitted herself into the Psychological Intensive Care Unit (PICU), Omaha VAMC, where she told Dr Gregory Keane, Staff Psychiatrist, Omaha VAMC, her plan was to gather her weapons and magazines from her residence on Tuesday night, January 28, 2020. HARDIN would then drive to the location she works at the VA and start shooting two dispatchers that she worked with, R.M. and J.S. HARDIN stated she wanted to kill these individuals because they had set her up to look bad and sabotage her work. After shooting them, she would continue to J.B.'s office, her immediate supervisor, to shoot and kill him, as she felt she was being continually

harassed by J.B. HARDIN stated she was aware her plan would probably end with her being killed by police.

6. Furthermore, HARDIN told Dr. Samuel Warn, Psychiatry Resident, Omaha VAMC, she owns “an Uzi, an AR-15, a sawed-off shotgun, and a Glock 9mm handgun.” HARDIN said her Uzi was her favorite because it was fully automatic and the last time she shot the weapons was around New Year’s Eve. HARDIN also stated to Kyle Lamb, Social Worker, Omaha VAMC that she was worried about someone taking her weapons from her residence and she had a friend secure them for her. HARDIN would not disclose her friends name or where the weapons are currently located.

7. Dr. Keane stated he believed HARDIN’s threat was real because while she was talking about her plan of attack, she was calm, collected, sound and coherent the entire conversation. Dr. Keane further stated, HARDIN new right from wrong and fully understood what she was saying. Dr. Keane did not feel HARDIN’s threats were triggered by any of her medical history, it was solely triggered by events caused at her work place.

8. Dr. Keane stated HARDIN also told J.C., Practical Nurse, Omaha VAMC, she would like to “hurt” JR, Business Office Manager, Omaha VAMC, for giving her a bad appraisal and PK, Registered Nurse, Omaha VAMC, for asking HARDIN questions about the weapons in her house.

9. At the time of admission, HARDIN’s urine toxicology came back negative for illegal substances/narcotics and her blood alcohol content only showed a trace of alcohol in her system.

10. On January 31, 2020, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), VAOIG, and Omaha Police Department, served and conducted a search warrant of HARDIN’s residence, 4121 Erskine Street, Omaha, NE. During the search, no weapons were found in the residence. The only gun accessories found in the residence were two gun locks. HARDIN’s daughter, K.H., DOB xx/xx/2000, was at the residence during the search, whom denied any knowledge about any weapons inside the house and stated her mom did not own any weapons.

11. On February 5, 2020, Daniel Zak, Co-chair NWI Distributive Behavior Committee, Omaha VAMC, conducted a Violent Risk Assessment Inventory (VRAI) General with HARDIN. The VRAI is used to help determine what level of threat HARDIN would pose to the VAMC if she was released on her own recognizance. During his assessment HARDIN reconfirmed she had access to “an Uzi, an AR-15, a sawed-off shotgun, and a Glock”. HARDIN stated they were not located at her residence, but they were at a secure location. HARDIN stated her favorite weapons was the Uzi. Zak asked HARDIN specifically, if there was not an intervention, would she have gone through with her plan. HARDIN stated she would have, and it would have been sad day and there could have been collateral casualties, but that was the price. HARDIN further stated, “once she had the guns, it’s over, the plan would be enacted.”

HARDIN said her coworkers' actions and discrimination against her were her triggers for making the threats. HARDIN expressed she no longer has homicidal or suicidal ideations and said she can't believe she got to the point of making the threats. Zak described HARDIN's demeanor during the assessment was very flat, matter of fact and her emotions stayed calm when answering his questions. Zak stated after the assessment he rated her at the highest level as a high risk to the VAMC.

12. On February 5, 2020, HARDIN requested to leave the PICU; however, Dr. Keane placed her on an involuntary hold, until further evaluations are complete. Due to the involuntary hold, HARDIN is no longer agreeing to take her medication she was prescribed while she was there voluntarily.

13. During interviews of HARDIN's two close work acquaintances, E.B. III, Shuttle Bus Driver, Omaha VAMC and R.F., Shuttle Bus Driver, Omaha VAMC, both stated HARDIN expressed concerns to them about her work environment while working with the Vehicle Transportation Services (VTS). They stated HARDIN thought her coworkers were racist, as they have said racial slurs to her in the past and were doing everything they could, to get HARDIN fired. They said HARDIN was not treated as an equal from the other shuttle drivers. Both stated they were surprised when they heard about the threats HARDIN made as it was not her typical behavior. HARDIN is normally quiet and keeps to herself.

14. During the interview of HARDIN's VTS co-workers, J.B., J.S., and R.M., all stated they did not have any issues with HARDIN when she first started working with VTS. A few months after she started, her work performance started to decline, she would continually go against VA policies while at work and would deliberately not do her job. These actions caused her co-workers to write Report of Contacts against her to document her poor work performance. Her poor work performance is what caused her leadership to give her a poor work appraisal. All three were surprised when they heard she made the threat against them as she had never shown any form of violence towards anyone at work. They all stated they are fearful for their life and have all put a protective order against HARDIN.

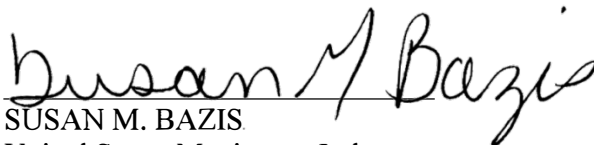
15. HARDIN has been convicted of felony robbery in Douglas County Nebraska in 1997.

16. Affiant has probable cause to believe, and this affidavit establishes, that HARDIN violated federal law, to wit: 18 U.S.C. 115(a)(1)(B)- Influencing, impeding, or retaliating against a Federal official by threatening or injuring a family member. On or about January 29, 2020, while in Omaha, Nebraska, HARDIN threatened to shoot up the VA and shoot VA dispatchers: R.M., J.S., and J.B., on account of their official duties at the VA.



Special Agent Tanner Collins  
U.S. Department of Veteran Affairs  
Office of Inspector General  
Criminal Investigations Division

Subscribed and sworn before me this  
10 day of February 2020.



SUSAN M. BAZIS  
United States Magistrate Judge